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Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
July 16, 2002

Southeast Regional Office

610-832-5949
Fax 610-832-6143

(b) (6)

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Willow Grove, PA 19090

Re: ECP – Special Projects – Act 2
Transit America/Island Green CC
LRP ID No. 1-51-0-27116
Red Lion Road
Lower Moreland Township
Montgomery and Philadelphia Counties

Dear (b) (6):

Thank you for your letter of June 30, 2002 addressed to Ms. Dayna Jones. The letter has been referred to the Environmental Cleanup Program, Special Projects Section for response. I will try to respond to your issues regarding the environmental cleanup; however, I am neither in a position to respond to issues you addressed to the Occupational Safety and Health Administration (OSHA), nor to your complaint that you have not received a response from OSHA.

The Pennsylvania Department of Environmental Protection's (PADEP) Environmental Cleanup Program became involved in the remediation of the 214-acre former Transit America, Inc. site in December 1997 when Transit America voluntarily submitted a Notice of Intent to Remediate. This was performed in accordance with the regulations developed pursuant to the Land Recycling and Environmental Remediation Standards Act (Act 2). Groundwater remediation and recovery had been on going prior to this for a number of years. The site was never designated by the Environmental Protection Agency as a Superfund Site, and from what I can tell, was not on the federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) list.

The site was first developed for manufacturing during World War II to produce aircraft parts and to assemble military cargo airplanes for the U.S. Government. At the end of the war, the facilities were converted to manufacture passenger railroad cars, and later, automobile chassis. After the cessation of manufacturing in 1987, and with no viable future manufacturing prospects, Transit America began a voluntary assessment of the property to determine current environmental conditions. This comprehensive three-year environmental assessment was completed in late 1989. Voluntary remedial action proceeded at that time under the PADEP oversight. More than 8,000 samples from soil, groundwater, storm water and building structures were collected at the site and analyzed for substances of environmental concern.

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The results of the three-year Environmental Assessment indicated that two primary groups of regulated substances were present on the property, Polychlorinated Biphenyls (PCBs) and Volatile Organic Contaminants (VOCs). PCBs were found at the site in surface and subsurface soils and on interior surfaces of some former manufacturing buildings. VOCs were identified in groundwater and below ground disposal areas. The risk assessment completed at that time concluded that human health risks were within EPA's acceptable risk range.

In response to the discovery of these regulated substances, Transit America implemented a series of phased, voluntary environmental remedial actions, such as: 1) a groundwater investigation and remediation program; 2) closure of 14 Underground Storage Tanks (USTs); 3) Operation of a VOC soil vapor extraction system; 4) a surface soil removal program in 22 localized areas which had contained PCBs at levels greater than 1,000 parts per million; and, 5) decontamination of the Main Assembly Building.

Based upon information submitted in the Final Report, the PADEP approved the report for soils, which have been investigated, characterized, and remediated. Volatile organic compounds, semi-volatile organic compounds (SVOCs), polychlorinated biphenyls, pesticides, and inorganic compounds listed in Table I titled "Regulated Substances in Soil Meeting Act 2 Standards," dated June 9, 2000, meet Residential, Non-Residential or Site Specific Standard as set forth in Figure 3 titled "Deed Restricted Areas for Soils; File No. 26216.001 -14" also dated June 9, 2000 and incorporated in the June 2000 Final Report.

The Department approved the Final Report and liability protection per Chapter 5 Section 501 of Act 2 was afforded on August 14, 2000.

We retain all files in our Records Management Section. You or your representative may view these by calling 610-832-6003 to schedule an appointment. The files you may wish to reserve are referred to as: Transit America, One Red Lion Road, ID No. 9514, ECP Act 2 and Tanks Program files. There are twenty-two folders associated with this case. You may also make a reservation by fax to 610-832-6289.

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I hope this satisfactorily responds to your inquiry. If you should need additional information, please call the Environmental Cleanup Program at 610-832-5950.

Sincerely,



Robert E. Day-Lewis, P.G.
Chief, Special Projects Section
Licensed Professional Geologist
Environmental Cleanup

cc: Ms. Jones
Mr. Kennedy
File
Re 30 (GJE02)196-6